

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CASE NO. 25-cr-117 (ECT/SGE)**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**DEFENDANT'S MOTION TO
MODIFY CONDITIONS OF
RELEASE**

JUSTIN DAVID EICHORN,

Defendant.

The Defendant, Justin David Eichorn, by and through his lawyers, Charles L. Hawkins and Arthur J. Waldon, IV, hereby moves the Court for an order modifying the conditions of his release to permit contact with his four children. In support of this Motion, Mr. Eichorn submits the following:

1. On March 20, 2025 the Court set Mr. Eichorn's conditions of release (ECF No 7). The release conditions include a restriction of "not associating with persons under the age of 18 except in the presence of a responsible adult who is aware of the nature of the background of the Defendant's current offense and who has been approved by the supervising officer."
2. The Government filed a motion to reopen the detention hearing on March 23, 2025 (ECF No. 12). The Court granted the Government's motion (ECF No. 13). On March 26, 2025 a detention hearing was held before the

Honorable Magistrate Judge Shannon G. Elkins (ECF No. 14). The Court following evidence and arguments, reinstated the previously imposed order setting conditions. Id.

3. Pursuant to the Court's order setting conditions of release, Mr. Eichorn currently resides in a half-way house in Duluth. Based upon the Additional Conditions of Release which include paragraph (u) limiting his association with persons under the age of 18 Mr. Eichorn has not had contact with his minor children since his arrest and indictment.
4. Mr. Eichorn wishes to continue his relationship with his children. Without a modification of paragraph (u) he will be cut off from his children.
5. Modifying the conditions of Mr. Eichorn's release to allow contact with his children by telephone and in person visits would not undermine any of the conditions of release previously imposed.
6. Mr. Eichorn has been served a petition for divorce which will involve custody questions regarding the couple's four minor children. Mr. Eichorn respectfully requests he have contact with his children both by telephone and in person so he may legitimately maintain his relationship with his children during this difficult time. This will allow the state court to address visitation of the children during any dissolution proceedings.

7. Counsel has contacted AUSA Daniel Bobier regarding this request. Mr.

Bobier has represented he has no objection to this request.

For these reasons, Mr. Eichorn respectfully requests this Court modify the Additional Conditions of Release in paragraph (u) to reflect he may associate with his four minor children.

Dated: April 18, 2025

Respectfully submitted,

/s/ Charles L. Hawkins

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